

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In re

Amendment of Section 73.202(b)
Table of Assignments
FM Broadcast Stations
Indian Springs, Nevada
Mountain Pass, California,
Kingman, Arizona and
St. George, Utah

)
)
)
)
)
)
)

RM - _____

DOCKET FILE COPY ORIGINAL

To: Chief, Allocations Branch

PETITION FOR RULE MAKING

Claire B. Benezra, by her attorney, hereby petitions for rule making to amend Section 73.202(b) of the Commission's rules as requested herein.

Benezra is the permittee of FM station KPXC, authorized on Channel 257A at Indian Springs, Nevada (the "station").¹ By this petition, she requests the Commission to initiate a proceeding which would result in the upgrade of the Indian Springs allotment to a full Class C, without a change of channel, i.e. from Channel 257A to Channel 257C. As a Class A, or even Class C3 facility, her station is limited in power and coverage. A full Class C facility would greatly add to the service area and is a more efficient use of the spectrum.

As shown by the attached engineering statement of Carl T. Jones Corporation, Channel 257C at Indian Springs, Nevada, will meet all Commission spacing requirements from a reference point of

¹ Benezra has an pending application for a one-step upgrade to Class C3, File No. BMPH-9510061A. Benezra will withdraw this application should the Commission grant the proposal made herein.

N Lat 36° 25' 18"; W Long 118° 48' 35", when the other proposed changes in the Table of Allotments are implemented. Further, transmitting from this reference point will provide city-grade coverage to all of Indian Springs.

This petition is filed pursuant to Section 1.420(g)(3) of the rules. As the proposal is mutually exclusive with Benezra's existing permit, no competing expressions of interest to the Indian Springs allotment will be permitted and Benezra will not risk the loss of her authorization to competing applicants.

In order to accommodate the proposed upgrade at Indian Springs, the following additional changes to the Table of FM Allotments must be made. Channel 258B must be substituted for Channel 259B at Mountain Pass, California; Channel 260C2 must be substituted for Channel 261C2 at Kingman, Arizona, and Channel 259C must be substituted for Channel 260C at St. George, Utah. Other than changing its frequency, none of these three stations need make any other change in its facilities. The proposed channels will be fully-spaced at the existing transmitter sites of these three stations.

Benezra has obtained the consent of Ear Corporation, licensee of FM station KSGI on Channel 260C at St. George to the change in its channel, and has reached an agreement regarding the amount she will pay KSGI as compensation for its change. A copy of KSGI's letter giving such consent is attached.

The requested changes will provide major public interest benefits. As shown by the engineering statement, KPXC will

provide a first reception service "white area" to 1,549 persons residing within 8,647 sq. km of the service area, based on the 1990 Census. Coverage of white area is the primary allotment criterion. Faye & Richard Tuck, Inc., 3 FCC Rcd 5374, 5376 (1988).

Moreover, a substantial number of persons not counted in the Census will receive their first local service. The white area population figure in the preceding paragraph counts only permanent residents. A large number of persons work at or visit the Nellis Air Force Range, the Nevada Test Site, the Desert National Wildlife Range, or the Death Valley National Monument. They are not included in the above-stated white area population figure.

Approximately 58 km along Highway U.S. 95, the direct route between Las Vegas and Carson City (the capital of Nevada), Reno and Lake Tahoe, lies within the white area to be covered by KPXC upon implementation of this proposal. Based on information from the Nevada Department of transportation, an average of 2,720 vehicles travel through this area each day, with each vehicle averaging 1.66 passengers. Thus, 26,277 persons travel along this portion of U.S. 95 each week, on the average. The Commission has recognized the value of providing service to motorists travelling through white area in its 1985 action granting KHYZ a waiver of Section 73.211.

A total of 19,705 persons will obtain a reception service from KPXC as a Class C facility, about seven and one-half times the population which KPXC would serve as either a Class A or Class C3 facility. Significant public interest benefits will clearly result from a grant of Benezra's petition.

The channel changes proposed herein fully comport with Commission policy. In Columbus, Nebraska, 59 RR 2d 1184 (1986), the Commission stated that a petition for rule making will not be accepted if it proposes to change the channels of more than two other stations, unless other significant public interest benefits, such as coverage of unserved area, warrant the changes. The two-station limitation was interpreted in subsequent cases to refer to two channel changes for which consent had not been received. A change involving more than two channels would be granted if consent to the change were obtained from all but two of the affected stations. FM Channel Allotments, Castle Rock, Colorado, 8 FCC Rcd 4475 (1993).

Both elements are present here; only two non-consenting stations are involved, and Benezra's proposal will result in significant public interest benefits. KSGI has consented to changing its channel to accommodate Benezra. The channel allotments of only two additional stations, KHYZ(FM) and KGMN-FM need be changed. Moreover, Benezra proposes to serve a substantial white area, including an important highway. The Commission noted in Columbus, supra, that service to unserved areas would qualify as a "significant and overriding benefit" warranting the substitution of more than two channels. Thus, Benezra's proposal fully meets the policy enunciated in Columbus.

Benezra recognizes her obligation to reimburse the three stations for their expenses in changing channels to accommodate her proposal, and agrees to make such reimbursement. As noted above,

she currently has a reimbursement agreement with one of the three stations. Benezra will promptly apply to modify her construction permit to reflect the change in allotment upon favorable Commission action on this petition, and will promptly construct the new facilities upon grant of the application.

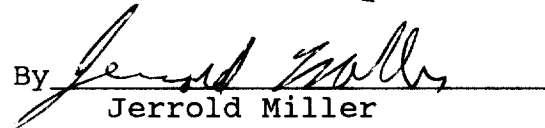
In view of the above, the public interest would be served by
Commission amending Section 73.202(b) as follows:

<u>Community</u>	<u>Present</u>	<u>Proposed</u>
Indian Springs, NV	257A	257C
Mountain Pass, CA	259B	258B
Kingman, AZ	261C2	260C2
St. George, UT	260C	259C

Respectfully Submitted,

CLAIRE B. BENEZRA

By


Jerrold Miller
Her Attorney

Miller & Miller, P.C.
P.O. Box 33003
Washington, DC 20033



AM 1450 • TELEVISION CHANNEL 4 • FM 99.7

May 22, 1996

Ms. Claire B. Benezra
4470 Vegas Valley Drive #19
Las Vegas, Nevada 89121

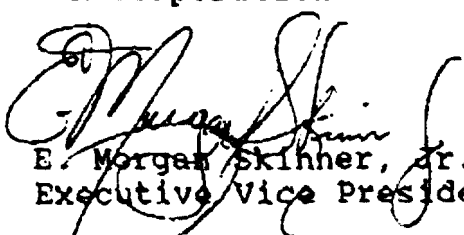
Dear Ms. Benezra:

I understand that you are the Permittee of FM Radio Station KPXC, Indian Springs, Nevada and that you wish to upgrade the station. To do so would require that KSGI-FM, St. George, Utah and other stations change their frequencies. It's proposed that KSGI-FM change from its current frequency of 99.7Mhz to 99.9Mhz.

I am the Executive Vice President of EAR Corporation, licensee of KSGI-FM and I am pleased to inform you that EAR Corporation has no objection to changing its frequency from 99.7Mhz to 99.9Mhz to accommodate your proposed upgrade. You have indicated that you will reimburse EAR Corporation its expenses for such a move, and we have agreed on the amount. You may submit this letter to the Federal Communications Commission.

Very truly yours,

EAR Corporation


E. Morgan Skinner, Jr.
Executive Vice President

EMS/pp

CC: Henry Crawford, Esquire

The Spirit Of Southern

CARL T. JONES
CORPORATION

STATEMENT OF CYNTHIA M. JACOBSON
IN SUPPORT OF A
PETITION FOR RULEMAKING REQUESTING AMENDMENT
OF SECTION 73.202(b) OF THE
RULES AND REGULATIONS

Proponent: Claire B. Benezra

I am an Engineer, an employee in the firm of Carl T. Jones Corporation, with offices located in Springfield, Virginia.

My education and experience are a matter of record with the Federal Communications Commission.

GENERAL

This office has been authorized by Claire B. Benezra, licensee of FM Broadcast Station KPXC(FM), Indian Springs, Nevada, to prepare this statement and associated exhibits in support of her Petition to the Federal Communications Commission requesting amendment of Section 73.202(b) of the Rules and Regulations (Table of FM Allotments) in the following manner:

	<u>Add</u>	<u>Delete</u>
Indian Springs, Nevada	257C	257A
Mountain Pass, California	259B	258B

STATEMENT OF CYNTHIA M. JACOBSON
KPXC(FM) - INDIAN SPRINGS, NEVADA
PAGE 2

Kingman, Arizona	261C2	260C2
St. George, Utah	260C ¹	259C

The proposed reference site for the Channel 257C allotment at Indian Springs are North Latitude 36° 25' 18", West Longitude 115° 48' 35". The reference sites for the other allotments are their licensed/authorized sites.

BACKGROUND

This amendment to the Table of FM Allotments is requested to increase the coverage of KPXC(FM) which also includes 8,647 square kilometers of white area. This amendment would also ameliorate the alleged potential interference to the "super-power" Class B facilities of KHYZ(FM), Mountain Pass, California. On October 6, 1995, KPXC filed an Application for modification of Construction Permit (FCC File No. BMPH-9510061A), seeking authority to upgrade the authorized construction permit facilities of KPXC(FM), Indian Springs, Nevada, under the "one-step process" on its presently licensed Channel 257A (99.3 MHz), to a Class C3 facility. On January 11, 1996 KHWY (California), L.P., ("KHWY") licensee of FM Station KHYZ, Mountain Pass, California, filed an Informal Objection alleging that:

¹ KSGI-FM, St. George, Utah has consented in writing to the channel change.

STATEMENT OF CYNTHIA M. JACOBSON
KPXC(FM) - INDIAN SPRINGS, NEVADA
PAGE 3

- 1) The KPXC application fails to specify a suitable fully-spaced reference site,
and
- 2) The KPXC application does not fully protect the KHYZ ("superpower") Class
B facility.

KHWY(FM) contends that KPXC(FM) does not provide equivalent contour protection to KHYZ(FM) as specified in Section 73.215. KHYZ(FM) is a "superpower" Class B facility.² KHWY(FM) believes the equivalent contour protection should be based on the authorized or actual facilities versus maximum Class B facilities. Though KPXC does not agree with the allegation of interference to the facilities of KHYZ³, this amendment to the Table of FM Allotments will resolve any allegations of interference.

The proposed rearrangement of channels described herein will result in a first radio service to white area and resolution of any alleged interference between KPXC and KHYZ.

As pointed out by KHWY, the Commission in 1985 granted a waiver of 73.211 to KHYZ to provide safety related information to travelers along Interstate 15 between

² KHYZ(FM) is licensed to operate with an ERP of 10 kW and an HAAT of 521 meters. Section 73.211(b) of the rules specify a Class B station as producing an effective radiated power of 50 kW from an antenna 150 M HAAT.

³ Section 73.215(b)(2)(11) of the Rules requires that protection be afforded KHYZ on the basis that maximum ERP and maximum HAAT be used for the particular class of station. KHYZ is a Class B station and thus entitled to protection based upon a maximum effective radiated power of 50 kW and 150 M HAAT, not "superpower" facilities.

STATEMENT OF CYNTHIA M. JACOBSON
KPXC(FM) - INDIAN SPRINGS, NEVADA
PAGE 4

Barstow, California and Las Vegas, Nevada. Exhibit 1 depicts the proposed 60 dBu contour of KPXC, operating as a maximum Class C facility from the proposed reference site. Likewise, KPXC will provide much needed safety-related information to travelers along U.S. Highway 95. U.S. Highway 95 is the main travel route from Las Vegas, Nevada to Carson City, Nevada⁴; Reno, Nevada; and the Lake Tahoe area. As shown in Exhibit 1, approximately 58 kilometers (36 miles) along U.S. Highway 95 lacks any primary radio service, commonly known as "white area." A large portion of this white area can be served by the proposal of KPXC. The total white area portion proposed to be served by KPXC is 8,647 square kilometers with a population of 1,549 persons. In addition, this number does not reflect the number of persons who are employed at the Nellis Air Force Range, Nevada Test Site, Desert National Wildlife Range, Death Valley National Monument and more importantly, travelers along U.S. Highway 95⁵. The Nevada Department of Transportation reports that the average daily traffic ("ADT") along this stretch of highway is 2,270 vehicles. The average occupancy per vehicle is 1.66 passengers, equating to 26,377 persons per week or 1,375,393 persons per year traveling along this portion of U.S. Highway 95.

⁴ Carson City is the capitol city of Nevada.

⁵ As evidenced in 1985, the FCC granted KHYZ a waiver of Section 73.211 for the purpose of providing critical public service to travelers along Interstate 15, thus the recognition by the Commission of the importance in providing service on major travel arteries.

STATEMENT OF CYNTHIA M. JACOBSON
KPXC(FM) - INDIAN SPRINGS, NEVADA
PAGE 5

The proposed KPXC Class C operation would serve a population of 19,705 persons. The pending "one-step" application to upgrade from channel 257A to Channel 257C3 will serve 2,577 persons. The authorized Class A construction permit facilities will service 2,657 persons within the 60 dBu contour. The proposal as described herein will not result in any lost service area when compared to the Class A and Class C3 facilities.

ALLOCATION STUDY

KPXC(FM) - Indian Springs, Nevada

KPXC(FM) is a Class A assignment licensed to operate on Channel 257A (99.3 MHz). It is proposed to change channels to Channel 257C.⁶ To permit the KPXC(FM) channel change, it will be necessary to substitute Channel 259B for Channel 258B for KHYZ, Mountain Pass, California; substitute Channel 261C2 for Channel 260C2 for KGMN, Kingman, Arizona; and substitute Channel 260C for Channel 259C for KSGL-FM, St. George, Utah.

A complete frequency allocation study was performed to ensure that a Channel 257C allotment at Indian Springs, Nevada, would meet all of the required minimum distance separations with respect to all existing and proposed facilities and assignments in the vicinity. The attached Table 1 details the results of this study and demonstrates

⁶ KPXC(FM) has a "one-step" application before the FCC to upgrade from Channel 257A to Channel 257C3. An "Informal Objection" has been filed by KHWY (California), L.P., licensee of FM station KHYZ, Mountain Pass, California.

STATEMENT OF CYNTHIA M. JACOBSON
KPXC(FM) - INDIAN SPRINGS, NEVADA
PAGE 6

that the proposed Channel 257C is in conformance with all required distance separations as set forth in the FCC Rules and Regulations. For the purposes of this rulemaking, the following reference coordinates were selected for KPXC(FM):

N.L. 36° 25' 18"

W.L. 115° 48' 35"

The reference coordinates are located approximately 21 kilometers southwest of the center of Indian Springs, Nevada, the principal community to be served. Exhibit 2 depicts the specified reference coordinates and the permissible site location area for a Channel 257C assignment in Indian Springs. From the reference site selected, the city of Indian Springs would be fully encompassed within the 70 dB contour.

KHYZ(FM) - Mountain Pass, California

A complete study was also conducted to ensure that a Channel 259B allotment at Mountain Pass, California, would meet all the required minimum distance separations with respect to all existing and proposed facilities and assignments in the vicinity. The attached Table 2 details the results of this study and demonstrates that the proposed Channel 259B is in conformance with all required distance separations as set forth in the

STATEMENT OF CYNTHIA M. JACOBSON
KPXC(FM) - INDIAN SPRINGS, NEVADA
PAGE 7

FCC Rules and Regulations. The reference coordinates selected are the same as the KHYZ(FM) licensed site and are as follows:

N.L. 35° 29' 27"

W.L. 115° 33' 27"

Since the reference coordinates set forth are the same as the KHYZ(FM) licensed site and no Class change is proposed, the coverage area will remain the same and city-grade coverage will be provided to the community of license.

KGMN(FM) - Kingman, Arizona

A complete study was also performed on the proposed allotment of 261C2 at Kingman, Arizona. As detailed in Table 3, the proposed allocation meets the required minimum distance separations with respect to all existing and proposed facilities and assignments in the vicinity. The reference coordinates selected for this rulemaking are:

N.L. 35° 06' 37"

W.L. 113° 52' 55"

STATEMENT OF CYNTHIA M. JACOBSON
KPXC(FM) - INDIAN SPRINGS, NEVADA
PAGE 8

The above stated reference coordinates for Kingman, Arizona, are those from which KGMN is currently licensed to operate and therefore, the city of Kingman would be fully served with a 70 dB field strength.

KSGI-FM - St. George, Utah

A study was also conducted on the proposed Channel 260C allotment for St. George, Utah. Table 4 shows the proposed allocation meeting all required minimum distance separations with respect to all existing and proposed facilities and assignments in the vicinity. The reference coordinates selected are those which are specified in the outstanding Construction Permit authorization (FCC File No. BPH-940404JY) of KSGI-FM and are as follows:

N.L. 36° 50' 49"


W.L. 113° 29' 28"

The reference coordinates are the same as those authorized in FCC File No. BPH 940404JY, thus the coverage area and city-grade coverage area remains the same.

STATEMENT OF CYNTHIA M. JACOBSON
KPXC(FM) - INDIAN SPRINGS, NEVADA
PAGE 9

The above statement and supporting exhibits were prepared by me or under my directed supervision and are believed to be true and correct.

DATED: June 26, 1996



Cynthia M. Jacobson

TABLE 1

Study Name: KPXC
 INDIAN SPRINGS, NEVADA
 ZONE 2
 Channel: 257C
 N. Latitude: 36 25 18
 W. Longitude: 115 48 35

Nearest FOB Station or Quiet Zone: Livermore, CA 547.99 Km 287.1 Deg.

CHAN	CALL	CITY AND STATE	LATITUDE	LONGITUDE	FILE NO	STATUS	ERP	HAAT	BEAR	DIST	REQD	CLEAR
257B1	Bakersfield	CA 35 28 28	118 40 35	-	USED	.000	0	248.6	279.18	259.0	20.18	
Reserved for KCHT per one-step application 9312131E-Effective 940415												
257C3	Indian Springs	NV 36 47 36	115 40 58	-	VACANT	.000	0	15.3	42.78			
Reserved For KPXC Per One-Step Application 9510061A												
257C3	KPXC Indian Springs	NV 36 33 9	115 36 8	BMPH-9510061A	APP	*	25.000	-11	51.8	23.59		
One-Step Application from Channel 257A												
257A	KPXC Indian Springs	NV 36 33 9	115 36 8	BPH-920921JL	CP		6.000	-51	51.8	23.59		
*To channel 257C3 Per One-Step Application 9510061A												
257A	Indian Springs	NV 36 34 30	115 46 6	-	USED	.000	0	12.2	17.41			
258B	KHYZ Mountain Pass	CA 35 29 27	115 33 27	BLH-851105KD	LIC		10.000	521	167.6	105.76	Move to Ch.259B	
GRANDFATHERED AT 10KW @ 521M HAAT												
258B	KHYZ Mountain Pass	CA 35 29 27	115 33 27	BPH-9509201H	CP		8.400	551	167.6	105.76	Move to Ch.259B	
259B	KHYZ Mountain Pass	CA 35 29 27	115 33 27	-	ADD	.000	0	167.6	105.76	105.0	0.76	
260C	NEW St. George	UT 37 3 12	113 49 20	BPH-880602NE	APP		34.000	953	67.8	190.86	105.0	85.86
Returned 890510-Petition for Recon 890615, Denied 901227-Application for Review												
260C	St. George	UT 37 6 18	113 34 36	-	USED	.000	0	68.4	213.32	105.0	108.32	
EFFECTIVE 5-30-86-FCFS-8-PN												
260C	KSGIFM St. George	UT 36 50 49	113 29 28	BPH-940404JY	CP		90.000	626	76.4	212.68	105.0	107.68
Transmitter site located in Arizona												
260C	KSGIFM St. George	UT 36 50 49	113 29 28	-	ADD	90.000	626	76.4	212.68	105.0	107.68	
Transmitter site located in Arizona												

TABLE 2

Study Name: KHYZ
 MOUNTAIN PASS, CALIFORNIA
 ZONE 1 / ZONE 1-A
 Channel: 259B
 N. Latitude: 35 29 27
 W. Longitude: 115 33 27

Nearest FOB Station or Quiet Zone: Livermore, CA 607.25 Km 296.0 Deg.

CHAN	CALL	CITY AND STATE	LATITUDE	LONGITUDE	FILE NO	STATUS	ERP	HAAT	BEAR	DIST	REQD	CLEAR
257C3		Indian Springs NV	36 47 36	115 40 58	-	VACANT	.000	0	355.6	144.96	71.0	73.96
Reserved For KPXC Per One-Step Application 9510061A												
257C3	KPXC	Indian Springs NV	36 33 9	115 36 8	BMPH-9510061A	APP	* 25.000	-11	358.1	117.87	71.0	46.87
One-Step Application from Channel 257A												
257A	KPXC	Indian Springs NV	36 33 9	115 36 8	BPH-920921JL	CP	6.000	-51	358.1	117.87	69.0	48.87
*To channel 257C3 Per One-Step Application 9510061A												
257A		Indian Springs NV	36 34 30	115 46 6	-	USED	.000	0	351.1	121.79	69.0	52.79
257C	KPXC	Indian Springs NV	36 25 18	115 48 35	-	ADD	.000	0	347.7	105.76	105.0	0.76
259C	NEW	St. George UT	37 3 12	113 49 20	BPH-880602NE	APP	34.000	953	41.3	233.18	Move to Ch.260C	
Returned 890510-Petition for Recon 890615, Denied 901227-Application for Review												
259C		St. George UT	37 6 18	113 34 36	-	USED	.000	0	44.1	252.47	Move to Ch.260C	
EFFECTIVE 5-30-86-FCFS-8-PN												
259C	KSGIFM	St. George UT	36 50 49	113 29 28	BPH-940404JY	CP	90.000	626	50.3	239.18	Move to Ch.260C	
Transmitter site located in Arizona												
260C	NEW	St. George UT	37 3 12	113 49 20	BPH-880602NE	APP	34.000	953	41.3	233.18	217.0	16.18
Returned 890510-Petition for Recon 890615, Denied 901227-Application for Review												
260C		St. George UT	37 6 18	113 34 36	-	USED	.000	0	44.1	252.47	217.0	35.47
EFFECTIVE 5-30-86-FCFS-8-PN												
260C	KSGIFM	St. George UT	36 50 49	113 29 28	BPH-940404JY	CP	90.000	626	50.3	239.18	217.0	22.18
Transmitter site located in Arizona												
260C	KSGIFM	St. George UT	36 50 49	113 29 28	-	ADD	90.000	626	50.3	239.18	217.0	22.18
Transmitter site located in Arizona												
260C2	KGMN	Kingman AZ	35 6 37	113 52 55	BLH-901120KG	LIC	.910	883	105.1	158.14	Move to Ch.261C2	
261C2	KGMN	Kingman AZ	35 6 37	113 52 55	-	ADD	.000	0	105.1	158.14	74.0	84.14
261B1		Ludlow CA	34 47 31	116 3 56	-	USED	.000	0	210.9	90.31	71.0	19.31
Proposed to Mexico as B on 920706-Accepted by Mexico 930112												

TABLE 3

Study Name: KGMN

KINGMAN , AZ

ZONE 2

Channel: 261C2

N. Latitude: 35 6 37

W. Longitude: 113 52 55

Nearest FOB Station or Quiet Zone: Douglas, AZ 561.58 Km 134.4 Deg.

CHAN	CALL	CITY AND STATE	LATITUDE	LONGITUDE	FILE NO	STATUS	ERP	HAAT	BEAR	DIST	REQD	CLEAR
259B	KHYZ	Mountain Pass CA	35 29 27	115 33 27	-	ADD	.000	0	105.1	158.14	74.0	84.14
260C2	KGMN	Kingman AZ	35 6 37	113 52 55	BLH-901120KG	LIC	.910	883	105.1	158.14		
260C	NEW	St. George UT	37 3 12	113 49 20	BPH-880602NE	APP	34.000	953	1.4	215.66	188.0	27.66
		Returned 890510-Petition for Recon 890615, Denied 901227-Application for Review										
260C		St. George UT	37 6 18	113 34 36	-	USED	.000	0	7.0	223.03	188.0	35.03
		EFFECTIVE 5-30-86-FCFS-8-PN										
260C	KSGIFM	St. George UT	36 50 49	113 29 28	BPH-940404JY	CP	90.000	626	10.2	195.89	188.0	7.89
		Transmitter site located in Arizona										
260C	KSGIFM	St. George UT	36 50 49	113 29 28	-	ADD	90.000	626	10.2	195.89	188.0	7.89
		Transmitter site located in Arizona										
261C2		Flagstaff AZ	35 11 36	111 39 6	-	VACANT	.000	0	86.8	203.43	190.0	13.43
		Effective 1-29-88-Reserved for either BPH860707NQ or BPH860707OC on 275C2										
261C2	NEW	Flagstaff AZ	35 14 26	111 35 48	BPH-860707OC	APP	1.000	599	85.4	208.68	190.0	18.68
		From Channel 275C2 per D87-76-Granted in Initial Decision 890814 in D88-275										
261B1		Ludlow CA	34 47 31	116 3 56	-	USED	.000	0	260.5	202.56	200.0	2.56
		Proposed to Mexico as B on 920706-Accepted by Mexico 930112										
261B1	NEW	Ludlow CA	34 43 29	116 9 24	BPH-950329MA	CP	* 25.000	-66	259.0	212.22	200.0	12.22
262B	KJMBFM	Blythe CA	33 37 16	114 35 28	BLH-861209KB	LIC	36.000	17	201.7	177.60	169.0	8.60

TABLE 4

Study Name: KSGI-FM
 ST.GEORGE , UT
 ZONE 2
 Channel: 260C
 N. Latitude: 36 50 49
 W. Longitude: 113 29 28

Nearest FOB Station or Quiet Zone: Douglas, AZ 690.57 Km 148.2 Deg.

CHAN	CALL	CITY AND STATE	LATITUDE	LONGITUDE	FILE NO	STATUS	ERP	HAAT	BEAR	DIST	REQD	CLEAR	
257C3		Indian Springs NV	36 47 36	115 40 58	-	VACANT	.000	0	268.9	195.64	96.0	99.64	
		Reserved For KPXC Per One-Step Application 951006IA											
257C3	KPXC	Indian Springs NV	36 33 9	115 36 8	BMPH-951006IA	APP	*	25.000	-11	260.8	191.46	96.0	95.46
		One-Step Application from Channel 257A											
257A	KPXC	Indian Springs NV	36 33 9	115 36 8	BPH-920921JL	CP		6.000	-51	260.8	191.46	95.0	96.46
		*To channel 257C3 Per One-Step Application 951006IA											
257A		Indian Springs NV	36 34 30	115 46 6	-	USED		.000	0	262.2	205.64	95.0	110.64
257C	KPXC	Indian Springs NV	36 25 18	115 48 35	-	ADD		.000	0	257.8	239.18	105.0	134.18
258B	KHYZ	Mountain Pass CA	35 29 27	115 33 27	BLH-851105KD	LIC		10.000	521	167.6	105.76	Move to Ch.259B	
		GRANDFATHERED AT 10KW @ 521M HAAT											
258B	KHYZ	Mountain Pass CA	35 29 27	115 33 27	BPH-950920IH	CP		8.400	551	167.6	105.76	Move to Ch.259B	
259C	NEW	St. George UT	37 3 12	113 49 20	BPH-880602NE	APP		34.000	953	41.3	233.18		
		Returned 890510-Petition for Recon 890615, Denied 901227-Application for Review											
259C		St. George UT	37 6 18	113 34 36	-	USED		.000	0	44.1	252.47		
		EFFECTIVE 5-30-86-FCFS-8-PN											
259C	KSGIFM	St. George UT	36 50 49	113 29 28	BPH-940404JY	CP		90.000	626	50.3	239.18		
		Transmitter site located in Arizona											
259B	KHYZ	Mountain Pass CA	35 29 27	115 33 27	-	ADD		.000	0	231.5	239.18	217.0	22.20
260C2	KGMN	Kingman AZ	35 6 37	113 52 55	BLH-901120KG	LIC		.910	883	105.1	158.14	Move to Ch.260C2	
261C2	KGMN	Kingman AZ	35 6 37	113 52 55	-	ADD		.910	883	190.4	195.89	188.0	7.89

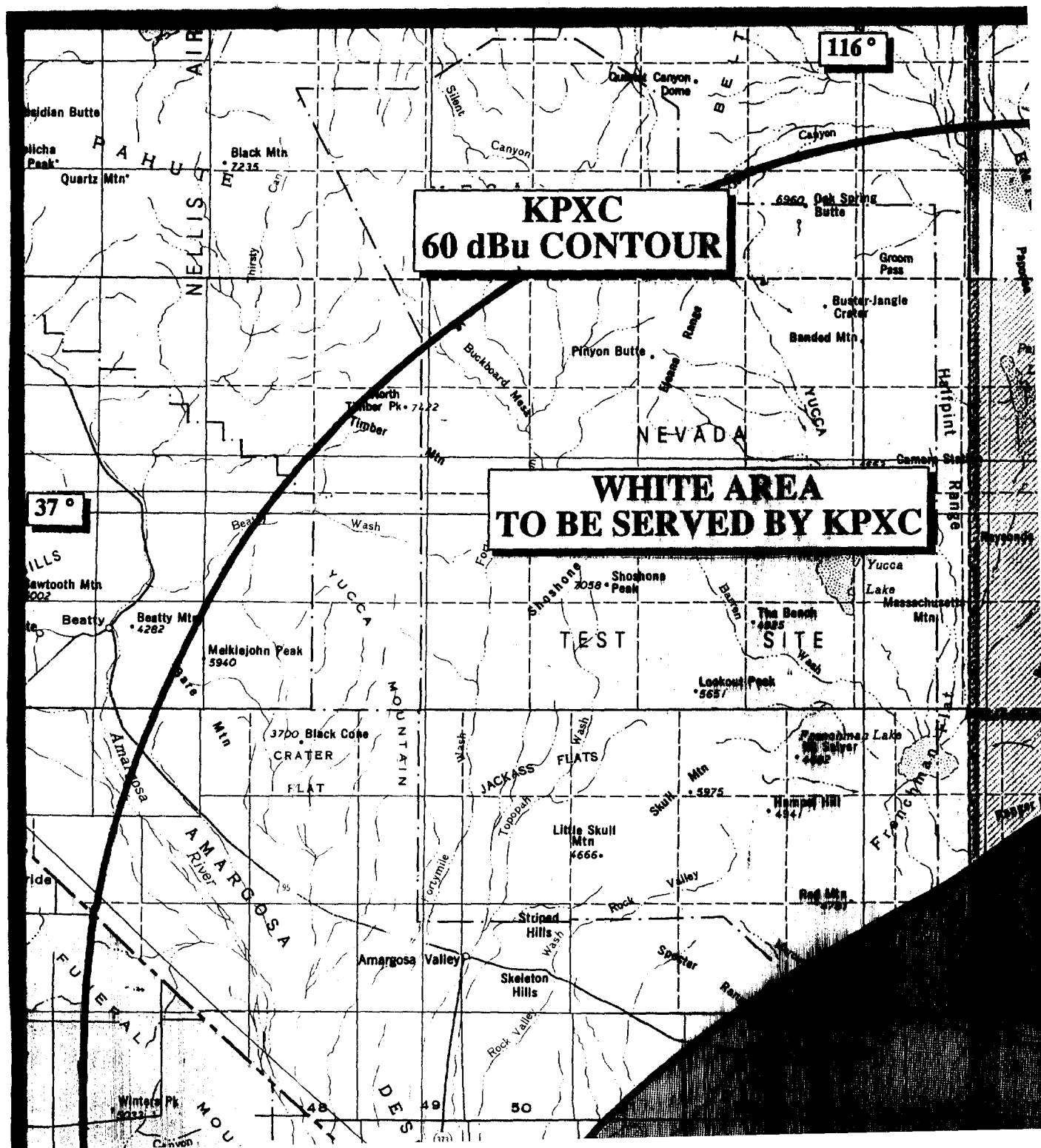
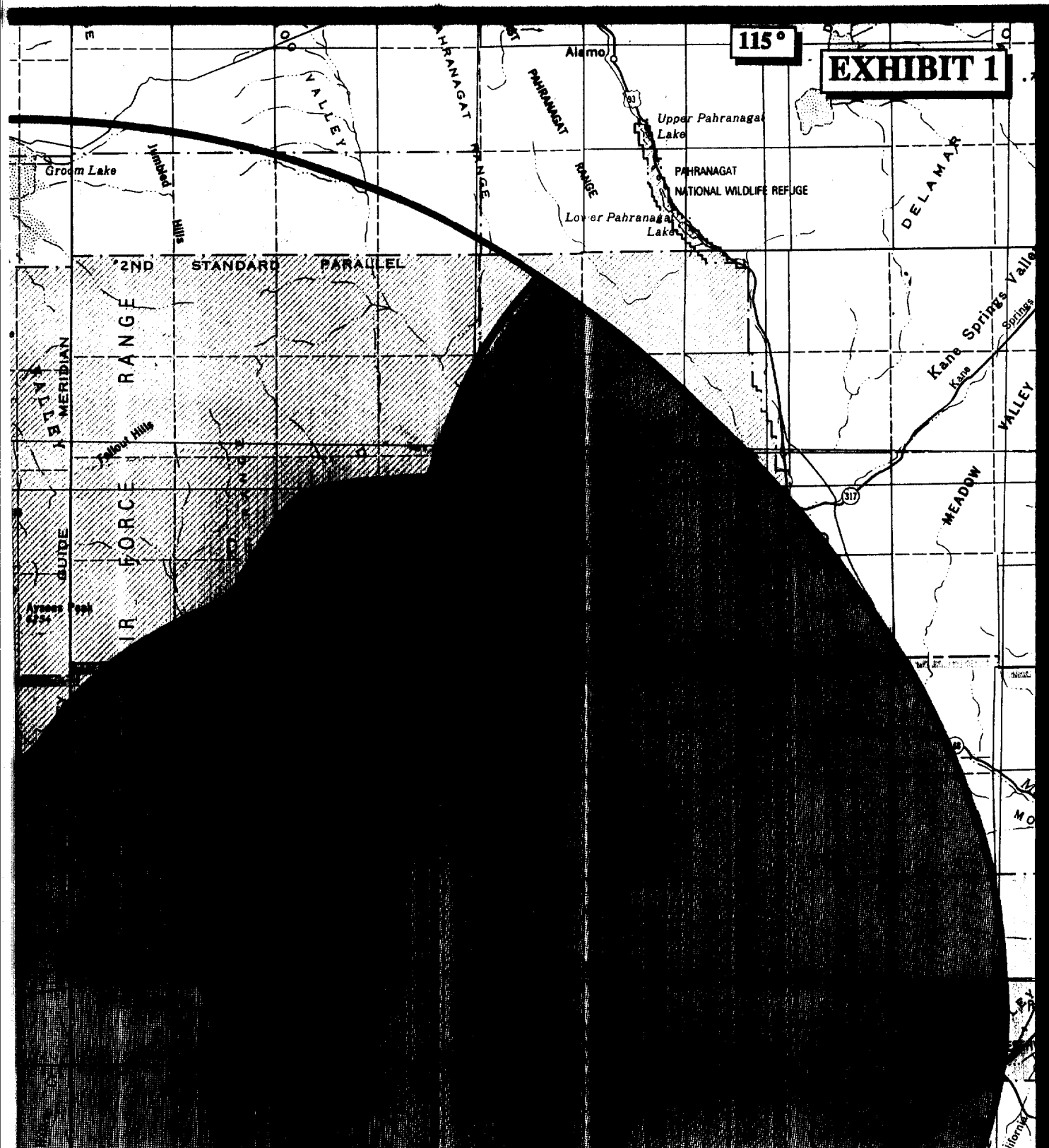
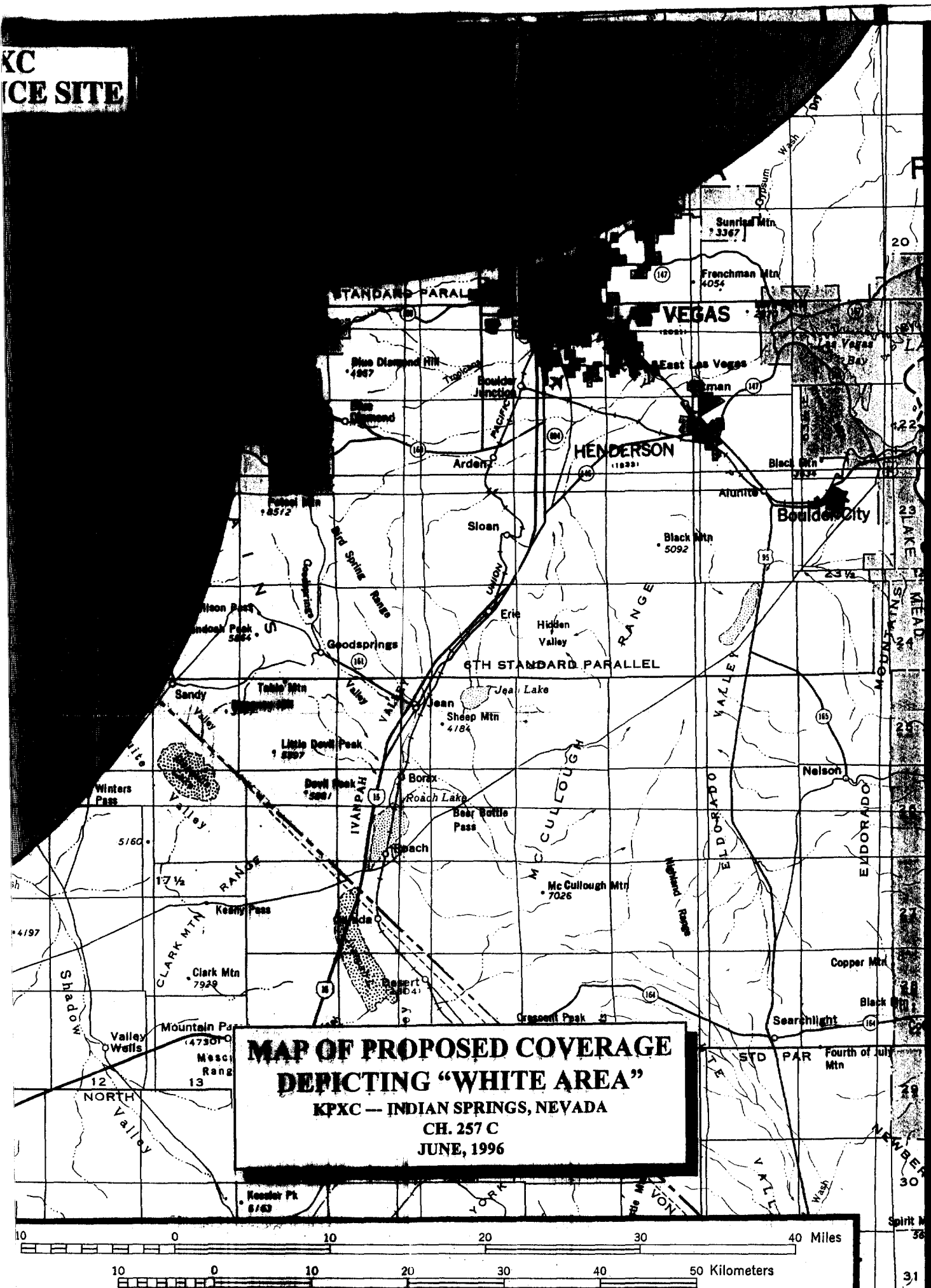


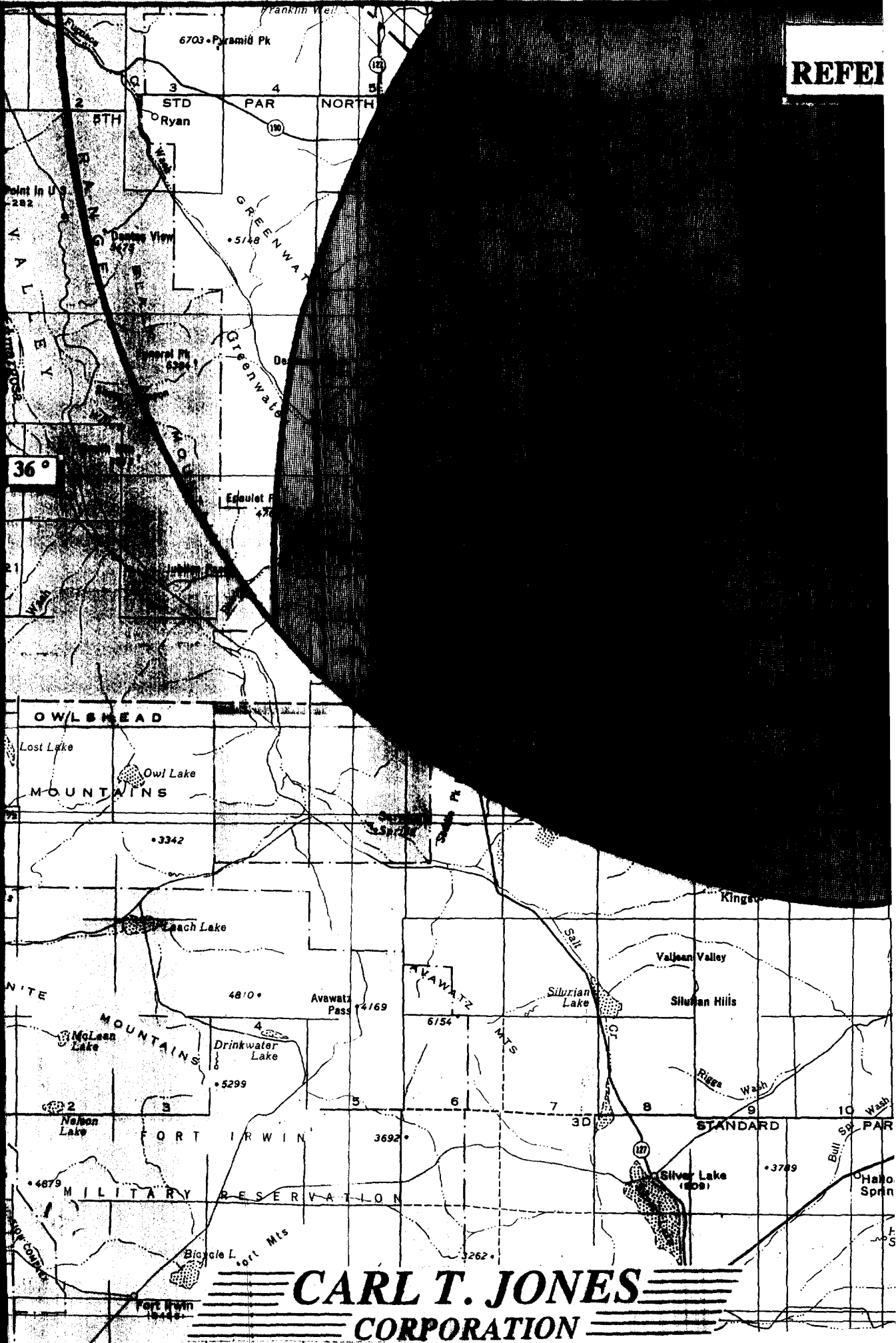
EXHIBIT 1

115°

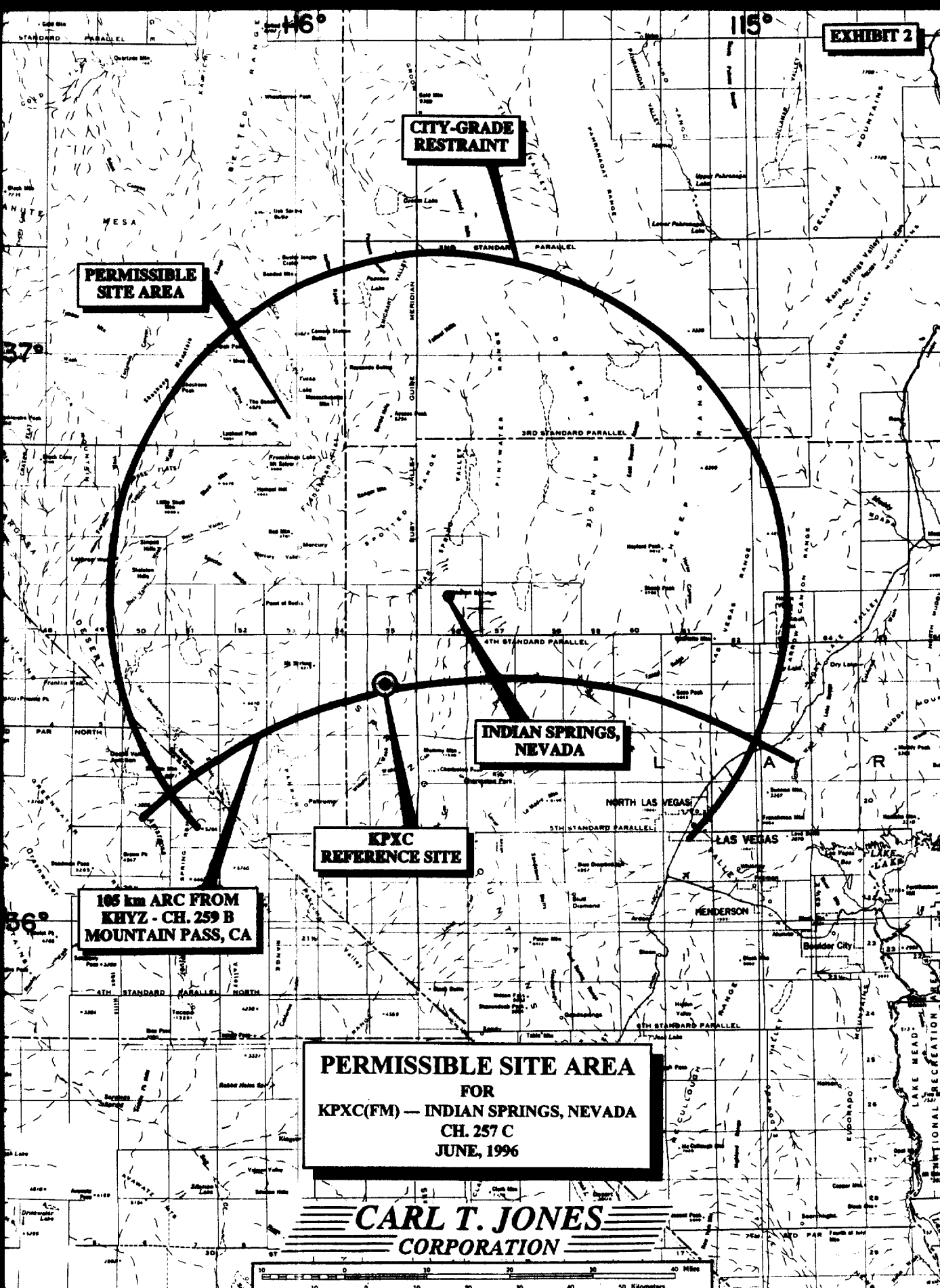




REFE



CARL T. JONES
CORPORATION



PERMISSIBLE
SITE AREA

CITY-GRADE
RESTRAINT

INDIAN SPRINGS,
NEVADA

KPXC
REFERENCE SITE

105 km ARC FROM
KHYZ - CH. 259 B
MOUNTAIN PASS, CA

PERMISSIBLE SITE AREA
FOR
KPXC(FM) — INDIAN SPRINGS, NEVADA
CH. 257 C
JUNE, 1996

CARL T. JONES
CORPORATION

